

O'BRIEN, BELLAND & BUSHINSKY, LLC

ATTORNEYS AT LAW

ROBERT F. O'BRIEN (NJ, PA & DC)
MARK E. BELLAND (NJ & PA)
STEVEN J. BUSHINSKY (NJ, NY & PA)
THOMAS F. KARPOUSIS (NJ)
KEVIN D. JARVIS (NJ & NY)
TIMOTHY P. HAGGERTY (NJ)
DAVID F. WATKINS, JR. (NJ & PA)
ANTHONY W. DESTEFANIS (NJ)
MATTHEW L. RAZZANO (NJ & PA)
W. DANIEL FEEHAN (NJ & PA)
MATTHEW B. MADSEN (NJ & NY)
DAVID H. LIPOW (NJ & PA)
PETER J. MOAK (NJ & PA)
J. STEWART BORROW* (NJ & NY)

*MASTERS OF LAW IN TAXATION

509 S. LENOLA ROAD
BUILDING 6
MOORESTOWN, NEW JERSEY 08057

(856) 795-2181
(888) 609-8300
FAX (856) 581-4214
INTERNET: WWW.OBBBLAW.COM
E-MAIL: OBBB@OBBBLAW.COM

OF COUNSEL

CARL J. MINSTER III (PA, NJ)
DAVID J. J. FACCIOLO (DE, PA)
DAVID R. THIERMAN* (NJ, PA & FL)
*MASTERS OF LAW IN TAXATION

JOAN FREEDMAN MEYER (NJ & PA)
1931-2011

EMAIL: mmadsen@obbblaw.com
FILE NO. 134902.00001

May 1, 2020

Via ECF

Hon. Joel Schneider, U.S.D.J.
United States District Court
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Salvatore, et al. v. ASRC Research and Technology Solutions, LLC, et. al.
Case No. 1:18-cv-09584-RMB-JS

Dear Judge Schneider:

Our office represents Plaintiffs, James Salvatore and Jared Salvatore (collectively, "Plaintiffs" or "Salvatores"), in the above captioned matter. The current discovery schedule calls for pretrial factual discovery to be concluded by May 30, 2020.

The parties previously submitted a joint request for an additional 60 days of pretrial factual discovery on March 18, 2020, limited to conducting the depositions of the following individuals: Kathleen Reichard, Lori Matus, Henry Dorsey, Kenneth Johnson, Chris Casey, and Shu Ho. We did not anticipate, as we believe most others did not, that the State of Emergency would last as long as it has. In light of Governor Murphy's Executive Order 107, which closed all non-essential businesses for the duration of the Order, the parties have been unable to schedule depositions of the remaining individuals.

After discussing this matter with counsel for A3T and ARTS, please accept this letter as a joint request for an additional 60 days of pretrial factual discovery limited to the depositions of the above-identified individuals. This would allow the parties additional time to evaluate whether in-person depositions will be practicable in the foreseeable future and subsequently conduct the depositions in whichever manner is appropriate under the circumstances.

Your Honor's attention to this matter is greatly appreciated.

Respectfully submitted,

O'BRIEN, BELLAND & BUSHINSKY, LLC

/s/ Matthew B. Madsen

Kevin D. Jarvis, Esquire
Matthew B. Madsen, Esquire

cc: William J. Leahy, Esquire (*via Electronic Mail: WLeahy@littler.com*)
Tara Param, Esquire (*via Electronic Mail: TParam@littler.com*)
Colin G. Bell, Esquire (*via Electronic Mail: coling@hankinsandman.com*)
Amy L. Kahn, Esquire (*via Electronic Mail: amyl@hankinsandman.com*)